## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK JOHN OJWANG' OMOLLO, Plaintiff, O7 Civ. 9259 (SAS) - against CITIBANK, N.A., Defendant.

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law in Support of Defendant Citibank N.A.'s Motion to Dismiss and the Declaration of Gert Johannes Petrus Olivier, dated March 11, 2008, the undersigned will move this Court, before the Honorable Shira Scheindlin, at the United States Courthouse, 500 Pearl Street, New York, New York, 10007, on April 9, 2007, for an Order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, or, in the alternative, for an Order pursuant to the doctrine of *forum non conveniens*: (i) dismissing the Complaint; and (ii) granting such other and further relief as the Court deems just and proper.

Dated: New York, New York March 12, 2008

KRAMER LEVIN NAFTALIS & FRANKEL LLP

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## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JOHN OJWANG' OMOLLO,

Plaintiff,

- against -

CITIBANK, N.A.,

Defendant.

## **NOTICE OF MOTION**

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